

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

UNITED STATES OF AMERICA,

Plaintiff

v.

FAYSAL KALAYAF MANAHE,
YASER AALI,
AMMAR ALKINANI, AND
QUASIM SAESAH

Defendants.

CRIMINAL ACTION

CASE NO. 2:22-CR-13-JAW

**DEFENDANTS' OBJECTIONS TO UNITED STATES'
REQUESTED JURY INSTRUCTIONS (ECF 150)**

Defendant Faysal Kalayaf Manahe ("Kalayaf") by and through counsel, Norman, Hanson & DeTroy, LLC, and on behalf of all Defendants object preliminarily to the Government's Proposed Jury Instructions (EDF 150). The parties appear to agree generally on the standard, preliminary instructions and many of the instructions are dependent on the evidence. Defendants object to the Government's specific, requested jury instructions as follows:

- **Government's Requested Jury Instruction No. 1:** Please see Defendants' Preliminary Jury Instruction #1 (ECF 154).
- **Government's Requested Jury Instruction No. 2:** Please see Defendants' Preliminary Jury Instruction #2 (ECF 154).
- **Government's Requested Jury Instruction No. 3:** Defendants

do not believe that this instruction will be fully generated by the evidence at trial (ECF 154).

- **Government's Requested Jury Instruction No. 6:** Please see Defendants' Requested Jury Instruction #3 (ECF 154).
- **Government's Requested Jury Instruction No. 9:** Please see Defendants' Requested Jury Instruction #4 (ECF 154).
- **Government's Requested Jury Instruction Nos. 9-17:** Please see Defendants' Requested Jury Instruction #5 (ECF 154).

The Defendants reserve the right to object to additional instructions following the introduction of evidence at trial and prior to the submission of this case to the jury.

Dated at Portland, Maine this 13th day of February, 2023

/s/ Thomas S. Marjerison
Thomas S. Marjerison, Esq. ~ Bar No. 7836
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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2023, I caused the filing of the foregoing Defendants' Objections to United States' Requested Jury Instructions, which sent such notice to the individuals and entities who have entered appearances in this case, pursuant to the Court's ECF system.

/s/ Thomas S. Marjerison

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Attorney for Faysal Kalayaf Manahe

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